REMARKS

Claims 1 and 3-17 are pending in this application. By this Amendment, claims 1, 9 and 14-17 are amended. Support for the amendments is found at least in paragraphs [0071] and [0078] of Applicant's specification. No new matter is added. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

Applicant appreciates the courtesies shown to Applicant's representative by Examiner Tyler in the August 29, 2008 telephone interview. Applicant's separate record of the substance of the interview is incorporated into the following remarks.

The Office Action rejects claims 1, 4, 5, 6, 9-12 and 14-17 under 35 U.S.C. §103(a) as being unpatentable over JP 10208034 to Kuwata et al. (hereinafter "Kuwata"), in view of Fukazawa et al. (hereinafter "Fukazawa"); rejects claim 3 under 35 U.S.C. §103(a) as being unpatentable over Kuwata, in view of Fukazawa, and further in view of U.S. Patent No. 6,046,820 to Konishi; rejects claim 7 under 35 U.S.C. §103(a) as being unpatentable over Kuwata, in view of Fukazawa, and further in view of U.S. Patent No. 5,872,643 to Maeda et al. (hereinafter "Maeda") and U.S. Patent No. 4,908,701 to Udagawa; and rejects claims 8 and 13 under 35 U.S.C. §103(a) as being unpatentable over Kuwata, in view of Fukazawa, Maeda, Udagawa, and further in view of U.S. Patent No. 5,408,267 to Main. These rejections are respectfully traversed.

The Office Action asserts that the coefficients yq1 and yq3 of Kuwata correspond to the claimed specific curve pattern portion. The Office Action acknowledges that Kuwata does not disclose that each of the specific curve pattern portion includes a plurality of points that show a pattern of the specific curve pattern portion. The Office Action alleges that because Fukazawa overcomes this deficiency in storing a limited number of points showing a pattern that may be interpolated into the full curve. The Office Action concludes that it

would have been obvious to modify the system disclosed by Kuwata such that each of the specific curve pattern portions includes a plurality of points that show a pattern of the specific curve pattern portion, in order to obtain a more detailed correction curve. The analysis of the Office Action fails for at least the following reason.

As discussed in the August 29 telephone interview with Examiner Tyler, Fukazawa merely discloses that a pre-conversion color conversion table having a small number of the lattice points is used to generate a regular color conversion table to save storage resource (see Fukazawa, col. 2, lines 17-35). Nowhere does Fukazawa disclose a plurality of specific curve pattern portions including a plurality of points that show a pattern of the specific curve pattern portion, as recited in claims 1, 9 and 14-17. The Examiner rebutted Applicant's representative's arguments in this regard asserting that he could broadly construe Kuwata as teaching all of the features recited in the pending claims except that in each of the alleged curve portions there was only a single point. Examiner Tyler then asserted that to the extent that Fukuzawa taught multiple lattice points, the Examiner could find specific features recited in the pending claims at least to have been suggested by this combination of references. Applicant's representative strongly traversed Examiner Tyler's assertions in this regard indicating that it took an overly broad reading of the references to arrive at such a conclusion. The Examiner remained unpersuaded. Without conceding the Examiner's conclusions, the independent claims are amended to clarify the recited features.

Claim 1 recites, among other features, a coefficient holding device to hold correction coefficients of a correction curve that correspond to the entire grayscale range or a portion of the grayscale range and include one or more correction points and a combination portion that is formed of a combination of a plurality of specific curve pattern portions, the one or more correction points being determined previously and independently of the input image data, and the coefficient holding device holding only the correction coefficients corresponding to one of

the specific curve pattern portions in the combination portion, the held correction coefficients including a plurality of previously calculated values corresponding to a range of grayscale values of the input image data. Claims 9 and 14-17 recite similar features. Kuwata, even in combination with Fukuzawa, would not have suggested this specific combination of features.
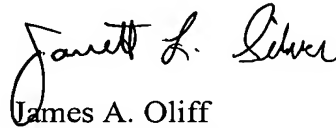
For at least this reason, Kuwata and Fukuzawa would not have suggested the combinations of all of the features positively recited in independent claims 1, 9 and 14-17. Further, no permissible combination of these references would have suggested the combinations of all of the features positively recited in claims 4-6 and 10-12, for at least the respective dependence of these claims directly on allowable base claims, as well as the separate allowable subject matter that these claims recite. Finally, because none of Konishi Maeda, Udagawa or Main are applied in any manner that would overcome the above-identified shortfall in the application of the other references to the subject matter of independent claims 1 and 9, the varyingly asserted combinations of applied references would not have suggested the combinations of all of the features positively recited in claims 3, 7, 8 and 13 for at least the respective dependence of these claims directly on allowable base claims, as well as the separate allowable subject matter that these claims recite.

Accordingly, reconsideration and withdrawal of the rejection of claims 1 and 3-17 under 35 U.S.C. §103(a) as being unpatentable over the various combinations of applied references are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1 and 3-17 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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